

Revised Guidance for Civil Money Penalty Reinvestment Projects

The Civil Money Penalty Reinvestment Program (CMPRP) is rescinding the March 12, 2021, "CMS Civil Money Penalty Guidance on Initial Project Funding" effective today, May 12, 2021. We are no longer limiting the number of facilities on an application. States can contact the CMPRP regarding reopening review of any applications not recommended for funding due to this policy. CMS will continue to enforce the current extension project criteria as its conception predates the March 12, 2021 guidance.

What is an extension project?

A project is considered an "extension project" if it is identical in project details to a project approved after April 1, 2018 (same applicant, same project focus, but to a new nursing home population). Applicants applying for an extension of an approved CMP reinvestment project to new nursing home location(s), do not have to complete the entire application.

The Resource Guide also provides guidance around applying for extension projects.* Applicants must submit the approval letter for the previously approved CMP reinvestment project and complete the following sections: Applicant Contact and Background Information (questions 1-2a, and 6), Funding (questions 7-9), Project Title (question 10-11), Partnering Entities (question 15 for non-nursing home applicants and question 16 for all applicants, if appropriate), and Attestation (question 22).

Additionally, the applicant must submit results of the previously approved and completed project (if applicable), with confirmation by the State Agency (SA). The frequency that the applicant submits CMP project results for review by the SA, is at the discretion of the SA and can be as early as 3 months on a 12-month project. Results must show that an applicant met the project's goals and objectives for an application extension to occur.

An applicant submitting an extension project must include a letter or email from the original State Agency(ies) of the previously approved, CMP-funded project. In the letter or email, the SA needs to state whether the previous applicant met project goals and objectives, and whether the SA recommends expanding this applicant's project to other nursing homes.

Sample Attestation Language from the SA

"...Department of Health, Health Standards Section is pleased to affirm that the above referenced project met its goals and objectives...We are able without hesitation to recommend this project for further funding."

**The above stated guidelines for an extension project, including references to application sections and page numbers, are provided on the CMP Reinvestment Application Template, available at <https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/Downloads/CMP-Reinvestment-Application-Resources.zip>. For SAs using their own application template, it is their responsibility to ensure their application guidance, instructions, and template align with the current CMP Reinvestment Program guidelines, as described above and available in the [CMP Reinvestment Application Resource Guide](#).*

Extension Project Examples:

- A. A corporate nursing home entity submits a CMP application to implement The ABC Project within five of their 10 facilities. Upon successful completion of the project, the entity submits a CMP application to expand the same project to their remaining 5 facilities. The State Agency must attest to the project's goals/objectives being met and whether they would recommend the entity and project expand to the remaining 5 facilities.

- B. An academic institution submits a CMP application to implement a project within 20 nursing homes in state "A". At a later date, the academic institution decides to expand the same project to a different set of 20 nursing homes in state "B". It is the same applicant, same project, different group of nursing homes. The State Agency in state "A" must provide an attestation of the project's results either by providing a letter or email in support of the project successfully meeting its goals/objectives, and that they would recommend the applicant and project expand to other nursing homes.

- C. A vendor submits a CMP application to implement a wound care training project in Texas. The applicant has been approved for the same project in other locations or states. These projects may be completed or ongoing. Prior to receiving a recommendation for approval of the current application, the applicant must submit project results to the corresponding SA who must provide an attestation stating that the project has met its goals/ objectives and whether they would recommend the applicant to extend the project to other nursing homes.

Questions or concerns may be sent to the CMPRP Team at CMP-info@cms.hhs.gov.